

**STATE OF SOUTH CAROLINA**

**(Caption of Case)**

**Application of FRC, LLC, for a Certificate of Public Convenience and Necessity to Provide Local Exchange Access Services throughout the State of South Carolina and Request for Flexible Regulation**

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**COVER SHEET**

**DOCKET**

**NUMBER: 2008 - 49 - C**

(Please type or print)

**Submitted by:** Margaret M. Fox

**SC Bar Number:** 65418

**Address:** McNair Law Firm, P. A.

**Telephone:** 803-799-9800

P. O. Box 11390

**Fax:** 803-753-3219

Columbia, SC 29211

**Other:** \_\_\_\_\_

**Email:** pfox@mcnair.net

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

**DOCKETING INFORMATION** (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:** \_\_\_\_\_

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

# MCNAIR LAW FIRM, P.A.

ATTORNEYS AND COUNSELORS AT LAW

The Tower at 1301 Gervais  
11<sup>th</sup> Floor,  
1301 Gervais Street  
COLUMBIA, SOUTH CAROLINA 29211

Post Office Box 11390  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE (803) 799-9800  
FACSIMILE (803) 753-3219

March 24, 2008

*via Electronic Filing*

The Honorable Charles Terreni  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211

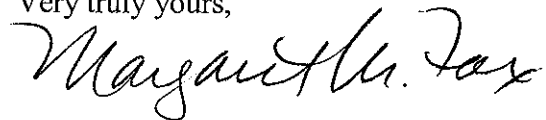
Re: Application of FRC, LLC, for a Certificate of Public Convenience and  
Necessity to Provide Local Exchange and Exchange Access Services  
throughout the State of South Carolina and Request for Flexible Regulation  
Docket No. 2008-49-C

Dear Mr. Terreni:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition a  
Petition to Intervene in the above-referenced docket. By Certificate of Service appended to the  
Petition, I am serving all parties of record.

Should you have any questions with respect to this matter, please do not hesitate to contact  
me.

Very truly yours,



Margaret M. Fox

MMF/rwm  
Enclosures

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2008-49-C

Application of FRC, LLC, for a Certificate of Public  
Convenience and Necessity to Provide Local Exchange  
and Exchange Access Services throughout the State of South  
Carolina and Request for Flexible Regulation

**PETITION TO  
INTERVENE**

In response to the Commission's Notice of the Filing of the Application of FRC, LLC, for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:


1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant local exchange telecommunications service providers is not appropriate and is not in the public interest. The Application, as currently drafted, would potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.  
Margaret M. Fox  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

By: 

Attorneys for Intervenor South Carolina  
Telephone Coalition

March 24, 2008

Columbia, South Carolina

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA

Docket No. 2008-49-C

Application of FRC, LLC, for a Certificate of Public  
Convenience and Necessity to Provide Local Exchange  
and Exchange Access Services throughout the State of  
South Carolina and Request for Flexible Regulation

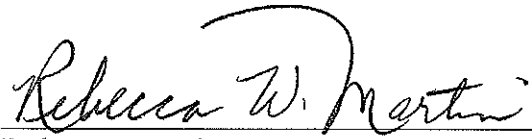
**CERTIFICATE OF  
SERVICE**

I, Rebecca Martin, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following parties of record by causing said copies to be deposited with the United States Mail, first class postage prepaid to:

Shannon Bowyer Hudson, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, South Carolina 29211

R. Vernon Williams  
FRC, LLC  
1500 Hampton Street, Suite 100  
Columbia, South Carolina 29201

M. John Bowen, Jr., Esquire  
Sue-Ann Gerald Shannon, Esquire  
McNair Law Firm, P. A.  
Post Office Box 11390  
Columbia, South Carolina 29211

  
Rebecca Martin  
McNAIR LAW FIRM, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(803) 799-9800

March 24, 2008

Columbia, South Carolina